

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU Investments LLC	§	
doing business as	§	
Brazos Licensing and Development,	§	
	§	Civil Action No. 6:20-cv-00952-ADA
Plaintiff,	§	Civil Action No. 6:20-cv-00953-ADA
	§	Civil Action No. 6:20-cv-00956-ADA
v.	§	
	§	
OnePlus Technology (Shenzhen) Co., Ltd.,	§	Jury Trial Demanded
	§	
Defendant.	§	

**DECLARATION OF MICHAEL LYONS IN SUPPORT OF
DEFENDANT’S OPENING CLAIM CONSTRUCTION BRIEF (GROUP 1 PATENTS)**

I, Michael J. Lyons, declare as follows:

I am an attorney with the law firm of Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“Defendant”) in the above-captioned action and am admitted *pro hac vice* in this action. I have personal knowledge of the statements contained in this Declaration which are true and correct and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

1. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 7,477,876.

2. Attached hereto as Exhibit B is true and correct copy of excerpts of the file history of U.S. Patent No. 7,477,876 including the October 2, 2003 Non-Final Rejection.

3. Attached hereto as Exhibit C is a true and correct copy of excerpts of the file history of U.S. Patent No. 7,477,876 including the February 2, 2004 Response to the Non-Final Rejection filed on October 2, 2003.

4. Attached hereto as Exhibit D is a true and correct copy of excerpts of the file history of U.S. Patent No. 7,477,876 including the August 6, 2004 Response to the Final Rejection filed on May 5, 2004.

5. Attached hereto as Exhibit E is a true and correct copy of U.S. Patent No. 8,149,776.

6. Attached hereto as Exhibit F is a true and correct copy of U.S. Patent No. 8,767,614.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of August 2021, in Los Altos, California.

/s/ Michael J. Lyons
Michael J. Lyons